

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

LILLIAN BERNIER,

Plaintiff,

v.

TURBOCAM, INC., HEALTH PLANS,
INC., & HARVARD PILGRIM HEALTH
CARE OF NEW ENGLAND, INC.

Defendants.

Civil Action No. 1:23-cv-00523-LM-AJ

STIPULATION OF DISMISSAL WITH PREJUDICE OF COUNTS II, III and V ONLY

Plaintiff, Lillian Bernier, and Defendant, Turbocam, Inc., hereby stipulate to the dismissal of Counts II, III and V of the Complaint only pursuant to Fed. R. Civ. P. 41 (a)(1) (A)(ii), with each party to bear its own attorney's fees and costs, and waiving all rights to appeal.

Dated: August 6, 2025

Respectfully submitted,

LILLIAN BERNIER,
By her attorneys,

/s/ Michael Haley

Chris Erchull, NH Bar No. 266733
Bennett Klein,* MA Bar No. 550702
Michael Haley, NH Bar No. 270236
GLBTQ Legal Advocates & Defenders
18 Tremont St. Suite 950
Boston, MA 02108
(617) 426-1350
cerchull@glad.org
bklein@glad.org
mhaley@gladlaw.org

TURBOCAM, INC.

By its attorney,

/s/ Bethany P. Minich

Bethany P. Minich, NH Bar No. 265413

Litchfield Cavo

6 Kimball Lane, Ste 200

Lynnfield, MA 01940

(781) 309-1500

minich@litchfieldcavo.com

/s/ Roger Byron

Roger Byron,* Texas Bar No.2462643

First Liberty Institute

2001 Plano Parkway, Suite 1600

Plano, TX 75075

(972) 941-4444

rbyron@firstliberty.org

* Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I, Bethany P. Minich, hereby certify that on August 6, 2025, I have caused a copy of the foregoing document to be forwarded via electronically served on all counsel of record.

/s/ Bethany P. Minich